

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	This is included in our definition of a complaint under section 4 of the policy as set out in the Complaint Handling Code	
1.3	A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.	Yes	Section 7 of the policy reflects the fact that the word ‘complaint’ does not have to be used for a complaint to be identified and treated as such. Section 6 also explains that we will accept complaints via third parties.	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be	Yes	Included in section 5 of the policy	

	recorded, monitored and reviewed regularly.			
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Included in section 7 of the policy	
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Included in section 5 of the policy	

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Included in section 5 of the policy	
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.	Yes	Included in section 5 of the policy	

	• Matters that have previously been considered under the complaints policy.			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Included in section 7 of the policy	
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Included in section 7 of the policy	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Included in section 5 of the policy	

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Included in section 1 of the policy	We have a reasonable adjustment mentioned in Section 2 of our policy
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Included in section 1 of the policy	Our staff receive annual training on the HO complaint handling code and ongoing support via monthly workshops
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	We have no target on the number of complaints received.	Staff are reminded to actively log all dissatisfaction. We improve service delivery through ongoing review of complaints themes and lessons learnt.
3.4	Landlords must make their complaint policy available in a clear and	Yes	Included in Section 7 and 10 and 11	The Policy is published on our website.

	accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.			
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Included in section 9 and 11 of the policy	
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Included in section 2 and 3 of the policy	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Included in section 9 of the policy	

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Reporting to the governing body is included in Section 10	Due to CDS's size, a separate role does not exist. A nominated manager oversees complaints for the organisation and ensures officers are equipped to manage complaints in line with our policy and the HOS handling code.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	This is done by the manager responsible for complaints across the organisation. The manager reports to the governing body and has access to all staff to facilitate prompt resolution. Monthly workshops take place to review themes, quality of response and lessons learnt.	Due to CDS's size, a separate role does not exist. A nominated manager oversees complaints for the organisation and ensures officers are equipped to manage complaints in line with our policy and the HOS handling code.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a	Yes	Included in Section 10	We seek continuous improvement through analysing complaints' themes and trends and using feedback and lessons learnt from concerns, complaints, and compliments to improve

	core service and must be resourced to handle complaints effectively			service design and delivery. We also work very closely with the MRC on service improvement.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	We only have one complaint policy	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Included in section 7	We have two stages
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Included in section 7	We have two stages
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be	Yes	Included in section 7	

	expected to go through two complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Included in section 7	Complaint will be handled in line with our policy, following the code
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	Included in section 7	Section 7 of the policy includes requirements when acknowledging a complaint. Our stage one and two acknowledgment templates are updated to include our understanding of the complaint and the outcomes the resident seeks.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Included in section 7	In the table
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position;	Yes	Included in section 8	

	c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.			
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Not included in the policy as our intention is to ensure the investigation and the response is carried out within the defined timescales. We use commitments to define the actions we have not been able to complete as part of our complaint response. All points raised by a resident are responded to within the defined timescales in the code.	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Included in section 5 of the policy	
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must	Yes	Included in section 7 of the policy	

	clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.			
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	On our Internal CRM system	All complaints are managed via our CRM system on a specific complaint management entity. The process is clearly defined and incorporates all major events.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Included in section 7 and 8 of the policy	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Unreasonable behaviour policy in place	We have an unreasonable behaviour policy,
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard	Yes	Included in the unreasonable behaviour policy	

	for the provisions of the Equality Act 2010.			
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Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Section 7 and 8 of our policy	We aim to resolve all complaints as early as possible and work with the resident on remedies as soon as the answer is known.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Included in section 7 of the policy	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Included in section 7 of the policy	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident	N/A	We don't have provisions for extensions	Our policy does not include a provision to extend the deadline by a further 10 days in exceptional cases. All complaints

	of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.			are managed within the defined timescales set in the HO code.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	N/A	Same as above	Same as above
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Included in section 8 of our policy	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Included in section 8 of the policy	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are	Yes	Stage one and two acknowledgements	The stage one and two acknowledgment templates encourage residents to contact us if they wish to raise any additional issues. Complaint handlers also contact the complainants during the

	unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			investigation and additional complaints will be added.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	Stage 1 template letter includes this information.	

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Included in section 7 of the policy	
6.11	Requests for stage 2 must be acknowledged, defined and logged at	Yes	Included in section 7 of the policy	

	stage 2 of the complaints procedure within five working days of the escalation request being received.			
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Included in section 7 of the policy	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Section 7 of the policy states that the manager of the person who responded at Stage One will respond at Stage Two.	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Included in section 7 of the policy	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	N/A		Our policy does not include a provision to extend the deadline by a further 10 days in exceptional cases. All complaints are managed within the defined timescales set in the HO code.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	N/A		Our policy does not include a provision to extend the deadline by a further 10 days in exceptional cases. All complaints are managed within the defined timescales set in the HO code.

6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Included in section 8 of our policy	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Included in section 8 of our policy	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Stage 2 template letter includes this information.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff	Yes	Escalation is to the Stage 1 respondent's manager. All Stage	

	members needed to issue such a response.		2 complaints are reviewed and validated by an external partner for adherence to the code.	
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	Included in Stage 1 and 2 letter templates. All staff are trained annually on these specific expectations. It includes the CIH requirements.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Compensation policy reflects this	We refer to the HO handling code guidelines when defining redress.

7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Stage 1 and 2 template letters include this. All commitments (actions) are logged centrally and managed weekly for completion.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Compensation policy includes this. We also get our Stage 2 responses validated by an external partner to check that our remedies resolve the issues.	

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: - the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. - a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; - any findings of non-compliance with this Code by the Ombudsman; - the service improvements made as a result of the learning from complaints; - any annual report about the landlord's performance from the Ombudsman; and - any other relevant reports or publications produced by the	Yes	A-We carry out a self assessment annually B-Report completed annually and published on website. WE have not had to refuse a complaint C-Self assessment is published on our website annually highlighting areas needing improvement D-Service improvement, lessons learnt advertised quarterly on Website E-None received but it would be published F-None received but it would be published	

	Ombudsman in relation to the work of the landlord.			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	It is reported to the board of management and published on our website under the complaint section. It is accompanied by a response statement by the governing body.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	N/A	We have not had those significant changes	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We would comply with the request.	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	We would comply with this expectation	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	All complaints feedback is analysed and lessons learnt identified monthly with staff. Lessons learnt is advertised on the website, in a section called "you said, we did" We have evidence of a change of policy and procedure following a complaint review. Feedback has also been helpful to determine further training required for staff.	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Reports to the governing body (Services Committee), outlines how we have used feedback to evolve and improve. Our MRC reviewed 8 complaints completed this Financial year for quality, adherence to the code and themes emerging, including good practice and areas where further development is required.	
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to	Yes	Quarterly reports to residents on Website Report to the governing body on wider learning and improvement.	

	stakeholders, such as residents' panels, staff and relevant committees.		Used feedback from complaints to define our Residents Influence Strategy. Resident influence strategy includes setting up Task and Finish groups to collaboratively work on service improvements.	
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	We have a member of staff leading on complaint handling. It includes reporting to board, arranging training and publishing lessons learnt.	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	We have a board member responsible for complaints. The MRC also sits on the Services Committee (Board committee). Report from MRC available	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	The MRC has access to the information required on request. He reports to the Governing Body annually when the report is presented and would escalate risks accordingly.	

9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	Quarterly at Services committee of the Board presented by staff leading on complaints' handling	
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints	Yes	All staff have a common objective in their yearly performance objectives and targets. <i>"Ensure that the complaint handling code requirements are followed when responding to complaints, and the timescales adhered to according to the policy. Achieve the best outcome for the resident in line with our values of collaboration and unity. Work with colleagues on improvements and act with</i>	

	as set by any relevant professional body.		<i>professionalism throughout the process.”</i>	
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